Exponent®

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January 18, 2008

TSCA Confidential Business Information Center (7407M)
EPA East – Room 6428 Attn: TSCA Section 8(e) Coordinator
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302



Re: 5:1 Mixture of Sodium (mono) 3-butyl-naphthalene-1-sulfonate and Sodium 3,6-dibutyl naphthalene-1-sulfonate
CAS # 25638-17-9 and 25417-20-3, Respectively

TSCA Section 8(e) Coordinator:

On behalf of our client the Joint Inerts Task Force (JITF) Cluster Support Team 10 (JITF CST 10) (1156 15th St. N.W., Suite 400, Washington, D.C. 20005), Exponent, Inc. is submitting information pursuant to the provisions of Section 8(e) of the Toxic Substance Control Act (TSCA). The JITF CST 10 includes the following member companies: Akzo Nobel Surface Chemistry, LLC, BASF Corporation, Bayer Crop Science, Cognis, Chemtura, Dow AgroSciences, LLC, DuPont, FMC Corporation, ISK Biosciences, Nufarm Americas, Rhodia, Inc., Syngenta, and Valent USA.

The following information is a summary of available data that is being reported under TSCA Section 8(e):

**Dose Selection**

The JITF CST 10 will conduct a Combined Repeated Dose Toxicity Study with a Reproduction/Developmental Toxicity Screening Test (OECD 442 – OPPTS 870.3650) using a 5:1 mixture of sodium (mono) 3-butyl-naphthalene-1-sulfonate (CAS # 25638-17-9) and sodium 3,6-dibutyl naphthalene-1-sulfonate (CAS # 25417-20-3).

In order to set appropriate doses for this study and to determine the Maximum Tolerated Dose, a range-finding study is ongoing, administering the test substance by oral gavage to groups of 3 male and 3 female rats at dose levels of 0, 75, 225, and 675 (later reduced to 450) mg/kg/day.

Dose levels are adjusted using a correction factor of 1.14 to account for purity of the test substance (87.4%) for the purpose of dose level calculation. The dose levels were chosen on the basis of an acute oral $LD_{50}$ value of 1500 mg/kg. The in-life part of the range-find is scheduled to be complete by early February 2008. The range-find study results will be submitted with the definitive study.

**Study Results**

One female rat in the highest dose group (675 mg/kg) was found dead after 2 days of treatment and a male of the same group was sacrificed prior to schedule termination after 3 days. The female rat had lost 5 g of body weight and the male lost 21 g since the beginning of treatment. No clinical signs were noted in the female, while the male showed hunched posture, piloerection, salivation, and diarrhea. At necropsy, the intestine was noted to have liquid content in both animals; in addition, a reduction of spleen size and stomach with a central constriction and thickened pars pilorica were observed in the male.

Based on the above-referenced information, the highest dose level was reduced to 450 mg/kg/day.

JITF CST 10 asserts that none of the information contained within this notice constitutes confidential business information.

If you have any questions, please contact me by phone at (202) 772-4932.

Sincerely,

James Messina
Authorized Representative of
Joint Inerts Task Force CST 10

cc: FIFRA 6(a)(2)
JITF CST 10
Angelina Duggan, Exponent
Michela Dall'Osto, Exponent